

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ETHAN MURPHY et al.

Plaintiffs

No. 13Civ-6503 (RJS) (SN)

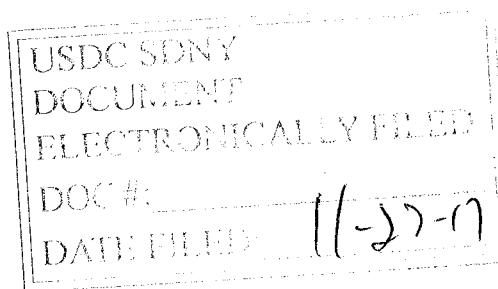
v.

PHILIPPE LAJAUNIE et al.

Defendants

Mr. Aaron J. Curtis

Law Clerk to the Honorable Sarah Netburn



By email and certified USPS mail, to the Court and Plaintiffs' lawyers

November 11, 2017

Dear Mr. Curtis,

Pursuant to Judge Netburn's Order dated October 10, 2017, please see my response to Plaintiffs' damages inquest submissions.

I was not sure which format should be used, so I chose to adopt the same format as the submissions'. This made it easier to respond to each important point in the three documents provided to the Court by Plaintiff's lawyers.

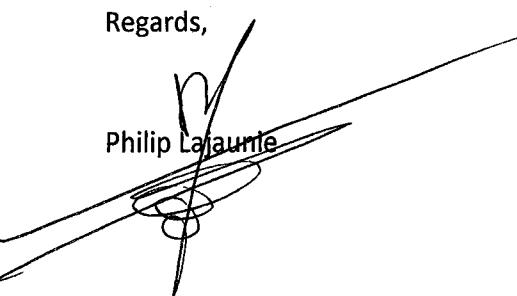
The main arc of my response is that the Default was generated by claims that the discovery was incomplete. In reality, these claims ignored that discovery lasted four years, providing thousands of requested documents, depositions, and affidavits. The last request came for a formatted list of employee information. The Court will see that the information was in fact provided, but not formatted as requested, because of legitimate circumstances, which were of unexpected, yet extreme hardship.

Plaintiffs' lawyers have taken advantage of this situation to make the most extravagant claims for damages, and related fees.

I pray the Court for seeing through this situation, instead considering the reality, and Order the most minimal damages and fees, as possible under the law.

Thank you,

Regards,


Philip Lajaunie

P. LAVAUER
PANA AVENUE #30
NYC 10016

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U.S.P.S.

Honorable Sarah Netburn

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40 Foley Square

New York, NY 10007